

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

IN RE: ATRIUM MEDICAL CORP. C-QUR MESH PRODUCTS LIABILITY LITIGATION	Master File No. 1:16-md-02753-LM MDL No. 2753 LANDYA B. MCCAFFERTY U.S. DISTRICT JUDGE
THIS DOCUMENT RELATES TO: ALL CASES	

**STIPULATION AND [PROPOSED] ORDER – PARTIES’ DEADLINE TO FILE
REPLIES TO DISPOSITIVE AND DAUBERT MOTIONS IN TRIAL PICK CASES**

Counsel representing plaintiffs in the above-captioned multi-district litigation (collectively, “Plaintiffs”) and defendants, Atrium Medical Corporation and Maquet Cardiovascular USA Sales, LLC (collectively, “Atrium” or “Defendants”) (Plaintiffs and Defendants, collectively, the “Parties”), have conferred and—in the interest of avoiding unnecessary motion practice and promoting the conservation of judicial resources—agreed to the Recitations and Stipulations below:

WHEREAS, on April 30, 2020, the Court entered its Order extending and setting certain deadlines relating to the bellwether cases in this MDL. *See* Doc. 1203;

WHEREAS, pursuant to this Order, the parties were to file dispositive and *Daubert* motions regarding the bellwether trial pick cases by June 12, 2020.¹ *Id.*;

WHEREAS, dispositive and *Daubert* motions were filed by both sides by the deadline, and, pursuant to the Court’s April 30 Order, Responses to these motions were due June 26, 2020, and Replies are due July 3, 2020. *Id.*;

WHEREAS, in its April 30, 2020 Order, the Court noted, “[t]he parties are free to modify

¹ However, due to certain circumstances of which the Court is aware, the parties agreed to a different briefing schedule relating to the parties’ regulatory experts. *See* Doc. 1207.

the above deadlines by their mutual agreement.” *Id.* at 4;

WHEREAS, the parties have mutually agreed to extend the deadline for the parties to file Replies to dispositive and *Daubert* Motions Regarding Trial Pick cases from July 3, 2020 to July 7, 2020;

WHEREAS, the Parties do not anticipate that this new proposed deadline will change or impact the First Trial date of September 16, 2020;

WHEREAS, the Parties have further agreed that they will not use the proposed extension of this deadline as reason to seek a delay of the First Trial date of September 16, 2020;

THEREFORE, the Parties respectfully ask the Court to enter the attached [Proposed] Order.

Dated: 07/01/2020

Respectfully submitted,

/s/ Jonathan D. Orent, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on July 1 2020, a true and correct copy of this document has been filed electronically with the Clerk of Court using the CM/ECF system. Notice of these filings will be sent to all counsel of record and parties by operation of the Court's electronic filing system.

/s/ Jonathan D. Orent, Esq.
Jonathan D. Orent